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20 Covidien Sales LLC

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Attorneys for Gaya Limited

15 THE UNITED STATES DISTRICT COURT
16 FOR THE CENTRAL DISTRICT OF CALIFORNIA
17 SOUTHERN DIVISION

18 APPLIED MEDICAL RESOURCES
19 CORPORATION,

20 Plaintiff,

21 v.

22 TYCO HEALTHCARE GROUP LP d/b/a
23 COVIDIEN,

24 Defendant.

25 SACV 11-01406 JVS (ANx)
26 Consolidated with SACV13-
27 24 JVS (ANx)

28 **COVIDIEN'S AND
GAYA'S DESIGNATIONS
OF DEPOSITION
TESTIMONY**

Honorable James V. Selna

Trial Date: March 11, 2014
Time: 9:00 AM
Place: Courtroom 10C

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2 Tyco Healthcare Group LP d/b/a Covidien, Covidien LP, and Covidien Sales
 3 LLC (“Covidien”) and Gaya Limited (“Gaya”) hereby submit the following
 4 deposition designations in the above-captioned matter.

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Jeremy Albrecht No. 11-cv-1406 JVS (ANx) Consolidated with 13-cv-24 JVS (ANx) Deposed on November 15, 2012					
Covidien and Gaya's Designations	Applied's Objections to Covidien and Gaya's Designations	Applied's Counter-Designations	Covidien and Gaya's Objections to Applied's Counter-Designations	Covidien and Gaya's Counter-Counter-Designations	Applied's Objections to Covidien and Gaya's Counter-Counter-Designations
7:23-8:11		12:19-22	FRE 802	13:23-14:9	
12:8-10		40:14-23	FRE 106; FRE 402; FRE 403; FRE 802; FRCP 32(a)(6) (Scope)	40:24-41:8	
12:23-13:5		42:9-17	FRE 402; FRE 403; AC	77:6-7	402/403
41:23-25		46:4-6	FRE 402; FRE 403; FRE 802	78:2-16	402/403
42:4-8		49:8-13	FRE 402; FRE 403; AC	91:17-21	402/403
45:9-11	402/403	68:21	FRE 802		
45:15-25	402/403	69:14-16	FRE 106 FRE 402; FRE 403; FRE 802		
46:7-8	402/403	75:18- 76:11	FRE 402; FRE 403; FRE 802		
46:12-14	402/403	76:24 – 77:5	FRE 402; FRE 403; FRE 802		

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Jeremy Albrecht No. 11-cv-1406 JVS (ANx) Consolidated with 13-cv-24 JVS (ANx) Deposed on November 15, 2012					
Covidien and Gaya's Designations	Applied's Objections to Covidien and Gaya's Designations	Applied's Counter-Designations	Covidien and Gaya's Objections to Applied's Counter-Designations	Covidien and Gaya's Counter-Counter-Designations	Applied's Objections to Covidien and Gaya's Counter-Counter-Designations
46:16-18	402/403	77:18 – 78:1	FRE 402; FRE 403; FRE 802		
48:1-8	402/403	80:6 – 82:3	FRE 402; FRE 403; FRE 802; FRCP 32(a)(6) (Scope)		
48:13	402/403	88:12-19	FRE 402; FRE 403; FRE 802		
49:6-7	402/403	90:23 – 91:16	FRE 106; FRE 402; FRE 403; FRE 802		
49:14-16	402/403				
49:18-50:11	402/403				
50:14-16	402/403				
50:18-51:2	402/403				
51:13-15	402/403				
53:18-21	402/403				
53:23-24	402/403				
54:1-25	402/403				
55:12-22	402/403				
56:3-18	402/403				
56:20-57:24	402/403				
58:7-9	402/403				
58:16-59:12	402/403				
59:17-60:3	402/403				
60:6-7	402/403				
60:9-18	402/403				
60:20-22	402/403				
60:24-61:3	402/403				
61:6-7	402/403				

Jeremy Albrecht
No. 11-cv-1406 JVS (ANx) Consolidated with 13-cv-24 JVS (ANx)
Deposed on November 15, 2012

Covidien and Gaya's Designations	Applied's Objections to Covidien and Gaya's Designations	Applied's Counter-Designations	Covidien and Gaya's Objections to Applied's Counter-Designations	Covidien and Gaya's Counter-Counter-Designations	Applied's Objections to Covidien and Gaya's Counter-Counter-Designations
61:22-62:8	402/403				
62:11	402/403				
62:13-63:8	402/403				
63:12-13	402/403				
65:2-6	402/403				
65:12-66:13	402/403				
67:12-68:20	402/403				
68:22-69:4	402/403				
69:17-21	402/403				
70:3-6	402/403				
70:15-71:9	402/403				
72:8-14	402/403				
72:16-17	402/403				
72:19-73:9	402/403				
74:6-12	402/403				
74:15-16	402/403				
74:18-20	402/403				
75:15-17	402/403				
76:17-21	402/403				
76:23	402/403				
78:17-79:4	402/403				
79:9-12	402/403/60 2				
79:14-15	402/403/60 2				
79:17-22	402/403/60 2				
84:14-85:10	402/403/60 2				
85:22-86:19	402/403, 602 as to 86:5-12				
87:4-17	402/403/60 2				

Jeremy Albrecht No. 11-cv-1406 JVS (ANx) Consolidated with 13-cv-24 JVS (ANx) Deposed on November 15, 2012					
Covidien and Gaya's Designations	Applied's Objections to Covidien and Gaya's Designations	Applied's Counter-Designations	Covidien and Gaya's Objections to Applied's Counter-Designations	Covidien and Gaya's Counter-Counter-Designations	Applied's Objections to Covidien and Gaya's Counter-Counter-Designations
87:20-88:2	402/403/60 2				
88:4-10	402/403				
90:11-20	402/403				

Robert Bowes No. 11-cv-1406 JVS (ANx) Consolidated with 13-cv-24 JVS (ANx) Deposed on November 14, 2012				
Covidien and Gaya's Designations	Applied's Objections to Covidien and Gaya's Designations	Applied's Counter-Designations	Covidien and Gaya's Objections to Applied's Counter-Designations	Covidien and Gaya's Counter-Counter-Designations
8:9-10:11		10:12 – 13:15	FRE 402	41:19-21
13:16-25		16:11-25	FRE 402 FRE 403	41:23-24
14:3-5		17:4-6	FRE 402 FRE 403	
14:7-15:4		17:8 – 18:8	FRE 402 FRE 403 FRE 802	
15:7-8		18:13-19	FRE 402 FRE 403	
15:10-12		19:16 – 20:2	FRE 106 FRE 402 FRE 403	
20:3-19		23:8-23	FRE 403 FRCP 32(a)(6) (Scope)	
20:21-23		26:1-21	FRE 403 FRCP 32(a)(6) (Scope)	
20:25-22:1		32:23-25	FRE 402 FRE 403 V	
22:3-6		36:20 – 37:21	FRE 403 FRE 602	
24:5-25:3		38:4-21	FRE 403 FRE 602	

<p style="text-align: center;">Robert Bowes No. 11-cv-1406 JVS (ANx) Consolidated with 13-cv-24 JVS (ANx) Deposed on November 14, 2012</p>				
Covidien and Gaya's Designations	Applied's Objections to Covidien and Gaya's Designations	Applied's Counter-Designations	Covidien and Gaya's Objections to Applied's Counter-Designations	Covidien and Gaya's Counter-Counter-Designations
25:6-8		39:14-22	FRE 106 FRE 403 FRE 602	
25:10-14		41:10-18	FRE 106 FRE 403 FRE 602	
26:22-28:19		45:17-22	FRE 403 V	
28:21-24		45:25	FRE 403 V	
29:1-30:17				
30:19-32:20				
33:3-8				
33:11				
33:23-34:3				
34:5-19				
34:22-24				
35:1				
35:4				
35:6-14				
35:17				
35:19-36:11				
36:13-14				
36:16-19				
37:22-38:3				
38:22-39:2				
39:4-5				
39:7-9				
39:11-12				
39:23-40:19				
40:21				
40:24-41:3				
41:6-9				
42:17-43:5				
43:7				
43:9-15				
43:18-44:2				
44:4-5				

1	Robert Bowes				
2	No. 11-cv-1406 JVS (ANx) Consolidated with 13-cv-24 JVS (ANx)				
3	Deposed on November 14, 2012				
4	Covidien and Gaya's Designations	Applied's Objections to Covidien and Gaya's Designations	Applied's Counter- Designations	Covidien and Gaya's Objections to Applied's Counter- Designations	Covidien and Gaya's Counter- Counter- Designations
5	44:7-11				
6	44:14-16				
7	45:8-16				
8	46:2-8				
9	46:11				
10	46:13-47:12				
11	47:14-15				
12	47:17-25				
13	48:3-4				
14	48:6-9				
15	48:11-12				
16	48:19-20				
17	48:23				
18	48:25-49:13				
19	49:15-16				
20	49:18-23				
21	49:25-50:1				
22	50:3-4				
23	50:6-8				
24	50:10-25				
25	51:8-14				
26	51:16-17				
27	51:19-23				
28	52:1				
	52:4-7				
	52:18-53:7				
	53:9-11				
	53:13				
	53:16				
	53:19-20				
	53:22-25				
	54:3-5				
	54:11-12				
	54:16-22				
	55:1-3				
	55:5-8				

1	Robert Bowes				
2	No. 11-cv-1406 JVS (ANx) Consolidated with 13-cv-24 JVS (ANx)				
3	Deposed on November 14, 2012				
4	Covidien and Gaya's Designations	Applied's Objections to Covidien and Gaya's Designations	Applied's Counter- Designations	Covidien and Gaya's Objections to Applied's Counter- Designations	Covidien and Gaya's Counter- Counter- Designations
5	56:2-9				
6	56:12-13				
7	56:15-20				
8	56:23				
9	56:25				
10	57:5-6				
11	57:8-12				
12	57:14-15				
13	57:19-21				
14	57:23-58:9				
15	58:12-21				
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17	59:6-13				
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2 John Brustad

3 No. 11-cv-1406 JVS (ANx) Consolidated with 13-cv-24 JVS (ANx)

4 Deposed on November 13, 2012

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Covidien and Gaya's Designations	Applied's Objections to Covidien and Gaya's Designations	Applied's Counter-Designations	Covidien and Gaya's Objections to Applied's Counter-Designations	Covidien and Gaya's Counter-Counter-Designations
8:7-8		21:12-18	FRE 402 FRE 403	
11:10-14		48:5-7		
12:18-13:11		82:16-23		
14:10-18		115:4-17	FRE 402 FRE 403	
14:24-15:4		139:14-17	FRE 402 FRE 403 FRE 701	
15:6-7		141:19-142:2	FRE 402 FRE 403 FRE 602	
15:9-12		178:16-24	FRE 402 FRE 403	
21:19-22:6		179:1	FRE 402 FRE 403	
22:8-10				
22:12-23				
24:12-16				
26:2-6				
26:8-11				
40:16-19				
40:25-41:5				
43:2-10				
43:12-44:2				
44:16-22				
46:22-47:9				
47:24-48:4				
48:8-19				
49:8-18				
49:20-50:7				
50:22-51:21				
51:25				
52:6-10				
52:22-53:5				

1	John Brustad				
2	No. 11-cv-1406 JVS (ANx) Consolidated with 13-cv-24 JVS (ANx)				
3	Deposed on November 13, 2012				
4	Covidien and Gaya's Designations	Applied's Objections to Covidien and Gaya's Designations	Applied's Counter- Designations	Covidien and Gaya's Objections to Applied's Counter- Designations	Covidien and Gaya's Counter- Counter- Designations
5	53:10-14				
6	54:25-55:3				
7	61:1-4				
8	71:7-9				
9	71:11-12				
10	72:24-73:2				
11	73:4-5				
12	73:7-8				
13	73:10				
14	73:23-74:17				
15	75:19-76:6				
16	77:10-13				
17	79:1-25				
18	80:6-17				
19	82:24-83:20				
20	86:1-4				
21	86:9-11				
22	86:13-15				
23	94:16-95:14				
24	95:20-22				
25	96:12-16				
26	97:3-10				
27	102:1-22				
28	103:2-16				
	105:11-18				
	107:9-16				
	108:1-12				
	108:17-109:5	402/403			
	109:8-20	402/403			
	109:25-110:7	402/403			
	110:13-111:1	402/403			
	111:3-5	402/403			
	111:14-21	402/403			
	111:25-113:8	402/403			
	113:14-23	402/403			

John Brustad No. 11-cv-1406 JVS (ANx) Consolidated with 13-cv-24 JVS (ANx) Deposed on November 13, 2012				
Covidien and Gaya's Designations	Applied's Objections to Covidien and Gaya's Designations	Applied's Counter- Designations	Covidien and Gaya's Objections to Applied's Counter- Designations	Covidien and Gaya's Counter- Counter- Designations
114:16-115:3	402/403			
128:10-13				
129:8-11				
132:14-23				
134:4-14				
136:18- 137:20	402/403 as to 136:18-23			
138:3-8				
138:10-16				
138:21- 139:13				
141:9-18				
142:6-19				
143:3-17				
143:20-23				
144:16-19				
145:16-20				
150:16- 151:13	402/403			
151:15				
151:25-152:4	402/403			
156:13- 157:12				
163:8-164:12	402/403			
172:19-24				
173:4-11	402/403			
173:17- 174:20	402/403			
175:14-177:9				
177:17-23	402/403			
177:25-178:2	402/403			
178:4-15				
181:21-25				
182:7-20	402/403			
182:22-23				
185:23-186:6				

1	John Brustad				
2	No. 11-cv-1406 JVS (ANx) Consolidated with 13-cv-24 JVS (ANx)				
3	Deposed on November 13, 2012				
4	Covidien and Gaya's Designations	Applied's Objections to Covidien and Gaya's Designations	Applied's Counter- Designations	Covidien and Gaya's Objections to Applied's Counter- Designations	Covidien and Gaya's Counter- Counter- Designations
5	186:17-23	402/403			
6	188:15-189:3	402/403			
7	197:10-16				
8	198:8-199:17				
9	200:13-16				
10	206:5-14				
11	206:22-207:2				
12	215:22- 216:10				
13	216:17-21				
14	218:20-24				
15	223:9-19				
16	223:23-25				
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John Brustad No. 05-cv-8914 GPS (SHx) Deposed on October 18, 2006				
Covidien and Gaya's Designations	Applied's Objections to Covidien and Gaya's Designations	Applied's Counter- Designations	Covidien and Gaya's Objections to Applied's Counter- Designations	Covidien and Gaya's Counter- Counter- Designations
7:10-11		13:17-25	FRE 402 FRE 403 FRE 602	17:11-16
7:18-21		14:21-15:4	FRE 402 FRE 403 FRE 602	19:10-19
8:8-9		16:6-21	FRE 402 FRE 403 FRE 602	
8:15-18		17:20-18:3	FRE 402 FRE 403 FRE 602	
11:23-12:3		25:15-26:10	FRE 402 FRE 403	
12:9-21		84:8-14	FRE 402 FRE 403 FRE 602 V	
13:1-9		106:20-25	FRE 402 FRE 403 AC FRCP 32(a)(6) (scope)	
14:7-20		107:3-8	FRE 402 FRE 403 FRE 602 AC V FRCP 32(a)(6) (scope)	
18:18-19:9		116:5-21	FRE 402 FRE 403 FRE 602 AC FRCP 32(a)(6) (scope)	

John Brustad No. 05-cv-8914 GPS (SHx) Deposed on October 18, 2006				
Covidien and Gaya's Designations	Applied's Objections to Covidien and Gaya's Designations	Applied's Counter- Designations	Covidien and Gaya's Objections to Applied's Counter- Designations	Covidien and Gaya's Counter- Counter- Designations
19:24-20:2		117:21-25	FRE 402 FRE 403 V	
20:5-7		118:7-9	FRE 402 FRE 403	
22:13-15		122:10-123:4	FRE 402 FRE 403	
23:19-25:2		126:7-9	FRE 106 FRE 402 FRE 403 FRE 602	
25:6-14		132:19-20	FRE 402 FRE 403 FRCP 32(a)(6) (scope)	
62:24-63:3		132:23	FRE 402 FRE 403 FRCP 32(a)(6) (scope)	
74:23-75:12		132:25-133:8	FRE 402 FRE 403 FRCP 32(a)(6) (scope)	
78:25-79:14				
79:17				
80:3-8				
80:10-15				
80:20-23				
81:10-13				
84:1-7				
85:3-12				
101:10- 102:11				
104:7-9				
104:11-12				
104:15-20				

John Brustad
No. 05-cv-8914 GPS (SHx)
Deposed on October 18, 2006

Covidien and Gaya's Designations	Applied's Objections to Covidien and Gaya's Designations	Applied's Counter-Designations	Covidien and Gaya's Objections to Applied's Counter-Designations	Covidien and Gaya's Counter-Counter-Designations
118:18-119:22				
120:7-8				
120:13-19				
120:21-121:5				
121:8-9				
121:12				
121:21-122:4				
122:7-9				
123:9-12				
123:14-17				
123:19-24				
124:1				
125:3-126:6				
126:12-127:6				
149:16-150:7	402/403			
150:10-151:2	402/403			
151:4-5	402/403			
151:12-20	402/403			

John Brustad No. 50 133T00316 06 Arbitration Testimony of October 10, 2007				
Covidien and Gaya's Designations	Applied's Objections to Covidien and Gaya's Designations	Applied's Counter- Designations	Covidien and Gaya's Objections to Applied's Counter- Designations	Covidien and Gaya's Counter- Counter- Designations
862:7-16		895:19 – 896:2	FRE 106 FRE 402 FRE 403 FRE 602 V	898:6-899:4
873:14- 875:19		941:14-17		
883:17-884:7		941:22 – 942:11	FRE 402 FRE 403 FRE 602	
892:20-893:7				
894:5-10				
895:8-18				
896:3-6				
908:12-909:4				
909:17-18				
913:17-22				
914:4-915:10	402/403/701			
915:14-16	402/403/701			
917:18-22				
940:6-941:1				
941:7-13				
941:18-21				
942:12-17				
942:22-943:2				
947:12-20				
954:17-956:5				
966:10- 967:12				
967:14-22				

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Nabil Hilal

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No. 11-cv-1406 JVS (ANx) Consolidated with 13-cv-24 JVS (ANx)

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Deposed on September 26, 2012

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Covidien and Gaya's Designations	Applied's Objections to Covidien and Gaya's Designations	Applied's Counter-Designations	Covidien and Gaya's Objections to Applied's Counter-Designations	Covidien and Gaya's Counter-Counter-Designations
8:13-14		49:21-50:19		
25:24-26:16		95:23-96:5	FRE 402 FRE 403	
29:15-24				
30:25-32:14	402/403			
36:13-19	402/403			
37:9-16	402/403			
48:8-49:20				
53:3-8				
61:11-13				
62:10-18				
62:25-64:5				
65:3-66:12				
87:20-25				
88:2-19				
95:1-5				
95:12-17				
96:21-97:11				
134:3-19				
137:11-138:7	402/403			
150:2-19				
151:10-152:7				
152:9-11				
173:10-21				
181:24-182:20	402/403			
182:24-183:12	402/403			

<p style="text-align: center;">Nabil Hilal No. 05-cv-8914 GPS (SHx) Deposed on November 2, 2006</p>				
4 Covidien and Gaya's Designations	5 Applied's Objections to Covidien and Gaya's Designations	6 Applied's Counter- Designations	7 Covidien and Gaya's Objections to Applied's Counter- Designations	8 Covidien and Gaya's Counter- Counter- Designations
7:10-14		65:20-25	FRE 402 FRE 403	163:16-17
44:4-15		162:4-9		
45:20-46:2		163:8-15	FRE 402 FRE 403	
51:2-7		164:4-7	FRE 402 FRE 403	
52:12-14				
65:3-19				
105:17-18				
106:2-8				
107:1-21				
108:18-19				
108:22-109:14				
111:2-112:6				
138:21-140:15				
160:8-12				
162:1-3				
162:15-163:7				

Arbitration Testimony of October 9, 2007				
Covidien and Gaya's Designations	Applied's Objections to Covidien and Gaya's Designations	Applied's Counter-Designations	Covidien and Gaya's Objections to Applied's Counter-Designations	Covidien and Gaya's Counter-Counter-Designations
580:7-8		624:5-625:8	FRE 402 FRE 403 FRCP 32(a)(6) (scope)	648:1-6
598:17-22		648:7-11		
603:3-604:9		649:14-650:2	FRE 402 FRE 403	
623:7-15				
624:1-4				
647:14-22				
648:13-649:13				
656:13-657:5				
657:21-22				
658:5-660:14				
661:6-662:6				

Nabil Hilal No. 50 133T00316 06 Arbitration Testimony of October 10, 2007				
Covidien and Gaya's Designations	Applied's Objections to Covidien and Gaya's Designations	Applied's Counter- Designations	Covidien and Gaya's Objections to Applied's Counter- Designations	Covidien and Gaya's Counter- Counter- Designations
781:17-782:21		779:15-20	FRE 402 FRE 403	
784:18-785:1		785:9-14		
785:3-8		812:5-813:5	FRE 402 FRE 403 FRE 602	
806:14-807:16		856:15-858:13	FRE 402 FRE 403 FRE 602 FRCP 32(a)(6) (scope)	
811:17-812:4		859:5-15	FRE 402 FRE 403 FRCP 32(a)(6) (scope)	
825:6-826:5				
826:8-10				
852:18-853:4				

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Curtis Huffmire
No. 11-cv-1406 JVS (ANx) Consolidated with 13-cv-24 JVS (ANx)
Deposed on October 17, 2012

2 Covidien and Gaya's Designations	3 Applied's Objections to Covidien and Gaya's Designations	4 Applied's Counter- Designations	5 Covidien and Gaya's Objections to Applied's Counter- Designations	6 Covidien and Gaya's Counter- Counter- Designations	7 Applied's Objections to Covidien and Gaya's Counter- Counter- Designations
7:6-10		31:6-11	FRE 402 FRE 403	101:13-21	
7:18-22		37:15-19	FRE 402 FRE 403	140:24-141:13	402/403
8:19-20		37:21-23	FRE 402 FRE 403		
8:23-9:1		74:7-14	FRE 402 FRE 403		
9:20-10:3		75:10 – 76:5	FRE 402 FRE 403		
10:12-19		78:3 – 79:13	FRE 402 FRE 403		
12:3-15		101:3-12	FRE 106 FRE 402 FRE 403		
14:22-25		101:13-21			
15:4-5		101:22 – 102:3	FRE 106 FRE 402 FRE 403		
15:8-11		102:6-9	FRE 106 FRE 402 FRE 403		
16:14-18:5	402	102:18-22	FRE 106 FRE 402 FRE 403		
18:12-16	402	103:24 – 104:5	FRE 106 FRE 402 FRE 403		
19:4-10		115:17 – 116:25	FRE 402 FRE 403		
19:23-20:1		117:7 – 118:9	FRE 402 FRE 403		
24:11-20	402	118:18-21	FRE 402 FRE 403		
25:3-6	402	118:25 – 119:1	FRE 402 FRE 403		
25:9	402	119:11 – 121:7	FRE 402 FRE 403		

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Covidien and Gaya's Designations	Applied's Objections to Covidien and Gaya's Designations	Applied's Counter-Designations	Covidien and Gaya's Objections to Applied's Counter-Designations	Covidien and Gaya's Counter-Counter-Designations	Applied's Objections to Covidien and Gaya's Counter-Counter-Designations
25:11-15	402	121:17 – 123:6	FRE 402 FRE 403		
25:22-26:1	402	123:21 – 124:15	FRE 402 FRE 403		
28:20-29:18	402	126:2-5	FRE 402 FRE 403		
29:19-30:1	402	126:7-20	FRE 402 FRE 403		
30:2-8	402	126:22 – 127:3	FRE 402 FRE 403		
37:25-38:7	402/403	127:6-25	FRE 402 FRE 403		
39:4-17	402/403	130:18 – 131:2	FRE 402 FRE 403		
39:22-40:13	402/403	134:17-23	FRE 402 FRE 403		
72:7-16	402/403	135:2-10	FRE 402 FRE 403		
72:25-73:20	402/403	140:14-23	FRE 106 FRE 402 FRE 403		
79:25-80:13	402/403				
80:14-19	402/403				
81:6-7	402/403				
81:11-13	402/403				
81:15-82:4	402/403				
85:8-11	402/403				
85:14-23	402/403				
85:24-86:2	402/403				
86:15-20	402/403				
88:1-10	402/403				
88:12-18	402/403				
89:21-24	402/403				
90:2-91:5	402/403				
91:8-23	402/403				
91:24-92:3	402/403				
93:7-9	402/403				

Curtis Huffmire No. 11-cv-1406 JVS (ANx) Consolidated with 13-cv-24 JVS (ANx) Deposed on October 17, 2012					
Covidien and Gaya's Designations	Applied's Objections to Covidien and Gaya's Designations	Applied's Counter-Designations	Covidien and Gaya's Objections to Applied's Counter-Designations	Covidien and Gaya's Counter-Counter-Designations	Applied's Objections to Covidien and Gaya's Counter-Counter-Designations
96:9-97:14	402/403				
97:17-22	402/403				
98:21-99:6	402/403				
99:7-100:12	402/403				
100:13-20	402/403				
100:12-101:1	402/403				
102:13- 102:17					
102:23- 103:19					
103:21-22					
106:2-6					
106:7-107:15	402/403				
109:2-10	402/403				
113:14- 114:21	402/403				
124:16-21	402/403				
124:24- 125:19	402/403				
129:20- 130:17	402/403				
131:3-132:12	402/403				
133:5-23	402/403				
133:25	402/403				
134:2-16	402/403				
137:3-138:12	402/403				
138:21- 139:18	402/403				
140:1-8	402/403				
140:12-13	402/403				
141:15-142:3	402/403				
142:6	402/403				
142:8-143:5	402/403				
144:2-5	402/403				
147:14-18	402/403				
147:21-22	402/403				

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No. 11-cv-1406 JVS (ANx) Consolidated with 13-cv-24 JVS (ANx)
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Covidien and Gaya's Designations	Applied's Objections to Covidien and Gaya's Designations	Applied's Counter-Designations	Covidien and Gaya's Objections to Applied's Counter-Designations	Covidien and Gaya's Counter-Counter-Designations	Applied's Objections to Covidien and Gaya's Counter-Counter-Designations
147:24-148:3	402/403				
148:10-12	402/403				
151:10-13	402/403				
151:17	402/403				
171:14-172:3	402/403				
172:5-9	402/403				
175:19-24	402/403				
176:4-177:1	402/403				
177:12-178:7	402/403				
178:9-10	402/403				
178:12-16	402/403				
178:19	402/403				
178:21-179:23	402/403				
180:5-7	402/403				
180:18-181:3	402/403				
182:1-9	402/403				
182:11-13	402/403				
182:16	402/403				
183:6-24	402/403				
189:8-10	402/403				
189:13	402/403				
190:3-9	402/403				

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Covidien and Gaya's Designations	Applied's Objections to Covidien and Gaya's Designations	Applied's Counter-Designations	Covidien and Gaya's Objections to Applied's Counter-Designations	Covidien and Gaya's Counter-Counter-Designations
6:10-11				
6:14-19				
11:7-16				
70:4-15				
72:11-25				
78:19-23				

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Gary Johnson No. 05-cv-8914 GPS (SHx) Deposed on October 31, 2006				
Covidien and Gaya's Designations	Applied's Objections to Covidien and Gaya's Designations	Applied's Counter-Designations	Covidien and Gaya's Objections to Applied's Counter-Designations	Covidien and Gaya's Counter-Counter-Designations
241:10-243:2	402/403			
243:4	402/403			
243:16-20	402/403			
243:24	402/403			

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Covidien and Gaya's Designations	Applied's Objections to Covidien and Gaya's Designations	Applied's Counter-Designations	Covidien and Gaya's Objections to Applied's Counter-Designations	Covidien and Gaya's Counter-Counter-Designations
1173:7-14		1175:2-9	FRE 106; FRE 402; FRE 403; FRE 602; FRE 802; FRCP 32(a)(6) (Scope)	1176:14-1177:2
1174:4-6		1176:7-13	FRE 402; FRE 403; FRE 802; FRCP 32(a)(6) (Scope)	
1177:15-18		1191:21-1192:7	FRE 106; FRE 402; FRE 403; FRE 602; FRE 802; FRCP 32(a)(6) (Scope)	
1178:2-22				
1180:4- 1181:10				
1182:5-22				
1183:8- 1185:16				
1186:15-21				
1188:1-10				
1188:17- 1189:15				
1190:4- 1190:17				
1191:11-15				
1193:6-16				
1194:9- 1195:11				

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1200:17-
1201:18
1208:2-12

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Norman Morales No. 11-cv-1406 JVS (ANx) Consolidated with 13-cv-24 JVS (ANx) Deposed on May 24, 2013				
Covidien and Gaya's Designations	Applied's Objections to Covidien and Gaya's Designations	Applied's Counter-Designations	Covidien and Gaya's Objections to Applied's Counter-Designations	Covidien and Gaya's Counter-Counter-Designations
8:20-24		11:3-7	FRE 402 FRE 403	51:18-21
10:13-11:2		27:3-18		71:20-72:5
11:10-19		28:1-3	FRE 402 FRE 403	72:12-14
14:18-15:11		34:13-16	FRE 402 FRE 403	72:17-73:5
16:2-8		41:13-23	FRE 402 FRE 403	75:8-9
16:9-17:10		51:7-17	FRE 402 FRE 403	132:8-10
17:11-15		61:7-10	FRE 402 FRE 403	132:12-19
17:20-18:20		62:7-24	FRE 402 FRE 403	132:22-133:5
18:23-25		64:20-65:3	FRE 402 FRE 403	133:7-18
19:3-13		65:8-14	FRE 402 FRE 403	178:5-12
22:11-24:4		65:21-23	FRE 402 FRE 403	
25:9-10		67:9-11	FRE 402 FRE 403	
25:14-26:5		67:16-18	FRE 402 FRE 403	
26:8		67:23-25	FRE 402 FRE 403	
26:14-27:2		68:15-18	FRE 402 FRE 403 FRE 802	
27:3-18		71:13-19	FRE 402 FRE 403 FRE 802	
27:19-22		75:6-7	FRE 402 FRE 403	
28:4-6		92:5-12	FRE 402 FRE 403	

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Covidien and Gaya's Designations	Applied's Objections to Covidien and Gaya's Designations	Applied's Counter- Designations	Covidien and Gaya's Objections to Applied's Counter- Designations	Covidien and Gaya's Counter- Counter- Designations
28:18-29:10		92:22-93:4	FRE 402 FRE 403	
30:20-31:6		92:7	FRE 402 FRE 403	
31:7-32:14		92:9-13	FRE 402 FRE 403	
32:23-25		97:22-98:3	FRE 402 FRE 403	
33:8-14		105:4-17	FRE 402 FRE 403	
34:23-35:5		106:14 – 107:4	FRE 402 FRE 403	
46:9-12		108:7-11	FRE 402 FRE 403	
46:21-25		111:6-11		
47:5		112:12-14		
47:7-22		112:18-113:16		
48:1-24		113:21 – 114:4	FRE 402 FRE 403	
49:13-50:21		114:25-115:12		
50:22-51:6		115:22-25	FRE 402 FRE 403	
51:22-52:10		117:2-9		
52:11-53:17		117:16-18		
54:2-58:4		118:9-19		
58:5-24		121:21-24		
59:1-60:13		131:24-132:5		
60:15-61:6		134:23-135:21	FRE 402 FRE 403 FRE 802	
61:18-25		177:3-24	FRE 402 FRE 403 AC	
62:1-6				
63:1-64:13				
64:14-19				

Norman Morales No. 11-cv-1406 JVS (ANx) Consolidated with 13-cv-24 JVS (ANx) Deposed on May 24, 2013				
Covidien and Gaya's Designations	Applied's Objections to Covidien and Gaya's Designations	Applied's Counter-Designations	Covidien and Gaya's Objections to Applied's Counter-Designations	Covidien and Gaya's Counter-Counter-Designations
65:4-7				
65:15-20				
66:14-67:8				
67:12-15				
67:19-22				
68:1-14				
68:19-71:3				
71:6-12				
73:6-22				
74:6-75:5	402/602			
75:10-76:9	402/602			
76:22-77:13	402/602			
	402/602 as to 77:16-22	77:16-18		
77:25-78:6	402/602			
78:7-15	402/602			
78:17-18	402/602			
78:20-23	402/602			
	402/602 as to 78:25-79:18	78:15 – 79:15		
	402/403 as to 79:25-81:4, 402/602 as to 81:5-8			
81:11-12	402/602			
81:14-15	402/602			
81:18-22	402/602			
81:24-25	402/602			
82:2-6	402/602			
82:9-13	402/602			
82:15-20	402/602			
82:22-23	402/602			
82:25-83:9	402/602			
83:10-84:3				
84:6-7				

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Covidien and Gaya's Designations	Applied's Objections to Covidien and Gaya's Designations	Applied's Counter-Designations	Covidien and Gaya's Objections to Applied's Counter-Designations	Covidien and Gaya's Counter-Counter-Designations
84:9-85:5				
85:6-23				
85:24-86:6				
86:25-87:20				
87:23-88:13				
88:15-89:11				
89:19-21				
89:24-90:5				
90:6-16				
90:19-24				
91:1-16				
93:22-95:23				
96:9-97:21				
98:4-102:10				
102:12-14				
102:18-23				
102:24-104:10				
104:15-105:3				
106:9-14				
110:24-111:3				
111:6-11				
112:12-14				
112:18-113:20				
114:25-115:21				
117:2-118:19				
118:20-24	402			
118:25-119:14				
119:15-22				
119:23-120:19	402			
120:20-121:20				
121:25-122:21	402/403			
123:1-17	402/403			
123:20-124:2	402/403			
124:12-125:14	402/403			

Norman Morales No. 11-cv-1406 JVS (ANx) Consolidated with 13-cv-24 JVS (ANx) Deposed on May 24, 2013				
Covidien and Gaya's Designations	Applied's Objections to Covidien and Gaya's Designations	Applied's Counter- Designations	Covidien and Gaya's Objections to Applied's Counter- Designations	Covidien and Gaya's Counter- Counter- Designations
125:21-126:2	402/403			
126:3-127:22	126:3-127:8 as to 402/403			
128:4-21	402/403			
128:22-129:13	402/403			
129:14-130:10	402/403			
130:13-16	402/403			
130:25-131:2	402/403			
131:5-131:13	402/403			
133:22-134:7	402/403			
136:18-137:18	402/403			
138:24-139:22	402/403			
139:25	402/403			
140:20-25	402/403			
141:5-7	402/403			
141:18-23	402/403			
142:1-14	402/403			
142:22-143:11	402/403			
143:14	402/403			
143:18-144:3	402/403			
144:4-16	402/403			
144:17-145:8	402/403			
145:11-14	402/403			
145:15-146:1	402/403			
146:2-14	402/403			
147:11-149:4	402/403			
154:21-158:10	402/403			
160:23-161:22	402/403			
164:6-14				
173:2-174:9				
174:12-15				
174:18-175:7				
175:10-11				
176:4-9				

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Norman Morales No. 11-cv-1406 JVS (ANx) Consolidated with 13-cv-24 JVS (ANx) Deposed on May 24, 2013				
Covidien and Gaya's Designations	Applied's Objections to Covidien and Gaya's Designations	Applied's Counter- Designations	Covidien and Gaya's Objections to Applied's Counter- Designations	Covidien and Gaya's Counter- Counter- Designations
176:11-15				

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Norman Morales
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Deposed on July 26, 2007

Covidien and Gaya's Designations	Applied's Objections to Covidien and Gaya's Designations	Applied's Counter-Designations	Covidien and Gaya's Objections to Applied's Counter-Designations	Covidien and Gaya's Counter-Counter-Designations	Applied's Objections to Covidien and Gaya's Counter-Counter-Designations
6:10-12		48:18-49:7	FRE 106	59:4-6	
6:19-21		56:25-59:3	FRE 106	59:13-17	
11:10-20		59:18-23	FRE 402 FRE 403	63:21-64:3	
31:15-25		61:20-23	FRE 402 FRE 403	65:8-19	
		62:2-9, 62:17-19; 63:5-20	FRE 106 FRE 402 FRE 403	116:19-22	
33:1-6		66:8 - 67:7	FRE 402 FRE 403	118:7-119:5	
34:16-24		68:4-69:12	FRE 402 FRE 403	119:9-11	
35:3-8		72:11-18	FRE 802	122:21-123:12	FRCP 32(a)(6) (Scope)
38:8-15		75:21-76:20	FRE 802	126:3-127:14	FRCP 32(a)(6) (Scope)
39:1-19		77:17-78:12	FRE 106	184:6-11	
40:9-42:11		102:22-103:9	FRE 802	194:12-15	
43:16-20		113:24- 115:10	FRE 402 FRE 403	194:23-195:7	
45:23-46:12		115:14-15	FRE 106	196:18-23	
48:9-13		116:12-18		210:20-211:16	
48:15-16		119:12- 120:10	FRE 402 FRE 403	212:1-5	
51:21-52:11		121:9-16		213:6-8	
59:24-60:25		138:8-20	FRE 402 FRE 403 FRE 802	213:12-15	
61:1-5			FRE 402 FRE 403 FRE 802		
61:8-10		152:9-153:19	FRE 402 FRE 403 FRE 802		
61:16-19		154:1-12	FRE 402 FRE 403 FRE 802		

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			FRE 402 FRE 403 FRE 802		
62:21-63:4		158:15-161:6			
65:20-66:7		179:20- 180:20	FRE 402 FRE 403		
69:13-72:3		181:23-182:5	FRE 402 FRE 403		
79:7-12		182:17-18	FRE 602		
101:16- 102:21		182:23-183:5	FRE 602		
110:20- 111:19		183:22-184:4	FRE 402 FRE 403		
111:20- 113:23		186:14-16	FRE 802		
115:11-13		187:11-14	FRE 802		
115:23-116:3		190:14-23			
117:18-118:4		192:18- 194:11	FRE 106		
128:15-130:8		202:7-22	FRE 802		
149:5-150:2		213:16-24	FRE 802		
151:10-152:8		215:12-22	FRE 402 FRE 403		
154:24- 155:11		219:23-25	FRE 402 FRE 403		
155:20- 156:25		250:16-19	FRE 402 FRE 403		
157:7-158:14		253:1-11	FRE 402 FRE 403		
180:21- 181:22	602				
182:6-11	602				
182:13-15					
183:6-21					
187:23- 188:13					
188:23- 189:22					
190:5-6					

<p style="text-align: center;">Norman Morales No. 05-cv-8914 GPS (SHx) Deposed on July 26, 2007</p>					
Covidien and Gaya's Designations	Applied's Objections to Covidien and Gaya's Designations	Applied's Counter-Designations	Covidien and Gaya's Objections to Applied's Counter-Designations	Covidien and Gaya's Counter-Counter-Designations	Applied's Objections to Covidien and Gaya's Counter-Counter-Designations
190:8-13					
190:24-					
191:14					
191:15-23					
192:1-192:17					
205:10-					
206:15	402/403				
206:19-207:9	402/403				
207:13-208:2	402/403				
214:17-					
215:11	402/403				
215:23-216:5	402/403				
216:9-219:3	402/403				
219:17-21	402/403				
226:9-227:14	402/403				
229:23-232:7	402/403				
237:21-238:4	402/403				
238:9-24	402/403				
239:4-13	402/403				
239:17-240:4	402/403				
240:6-16	402/403				
247:19-					
248:16					
249:16-					
250:15					
252:19-23					
255:14-256:6					
256:10-257:8					

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Covidien and Gaya's Designations	Applied's Objections to Covidien and Gaya's Designations	Applied's Counter-Designations	Covidien and Gaya's Objections to Applied's Counter-Designations	Covidien and Gaya's Counter-Counter-Designations
1324:5-12		Direct Testimony of Norman Morales, ¶¶ 1-44	FRE 402 FRE 403 with respect to all except ¶¶ 19, 20, 27	1336:14-1337:4
1327:17-1329:3		1329:13-1330:4	FRE 402 FRE 403	1349:20-1350:7
1331:7-17		1347:19-1348:10	FRE 402 FRE 403	1350:22-1351:22
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FRE 402	FRE 402 Federal Rule of Evidence 402	Irrelevant
FRE 403	FRE 403 Federal Rule of Evidence 403	Unduly prejudicial, wasteful, confusing, misleading or cumulative
FRE 602	FRE 602 Federal Rule of Evidence 602	Lack of foundation/personal knowledge (including calls for speculation)
FRE 611	FRE 611 Federal Rule of Evidence 611	Argumentative, or attorney argument
FRE 701	FRE 702 Federal Rule of Evidence 701	Opinion testimony by lay witness
FRE 702/703	FRE 702 Federal Rule of Evidence 702	Improper foundation/basis for expert testimony
FRE 802	Federal Rule of Evidence 802	Hearsay if offered for the truth of the matter asserted
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S		Beyond the scope of the 30(b)(6) notice
I		Incomplete Hypothetical
U		Uncorroborated Inventorship Testimony
V		Vague